

BDM
F. #2018R00550/OCDETF# NY-NYE-875

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

– against –

Criminal Docket No. 21-208 (WFK)

VAL COOPER *et al.*,

Defendants.

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The United States of America, by and through MARK J. LESKO, Acting United States Attorney for the Eastern District of New York, and Brian D. Morris, Keith D. Edelman and Joy Lurinsky, Assistant United States Attorneys, hereby files the following Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Sections 982(a)(1) and 982(b)(1), and Title 21, United States Code Section 853(p). The United States hereby gives notice that, in addition to the property described in the forfeiture allegations in the above-captioned Indictment, the United States seeks forfeiture of all right, title and interest in the property listed in Exhibit A hereto, pursuant to Title 18, United States Code, Sections 982(a)(1) and 982(b)(1), and Title 21,

United States Code, Section 853(p). The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York
May 28, 2021

Respectfully submitted,

MARK J. LESKO
Acting United States Attorney

By: _____/s/
Brian D. Morris
Keith D. Edelman
Joy Lurinsky
Assistant United States Attorney
(718) 254-7000

Exhibit A

Approximately three hundred twenty-five thousand eight hundred nine dollars and seventy-one cents (\$325,809.71) seized from JP Morgan Chase Bank account number 3591685525 held in the name of Ninel Kononenko on or about April 20, 2021, and all proceeds traceable thereto; and

Approximately fifty-two thousand two hundred twenty-five dollars and seventy cents (\$52,225.70) seized from JP Morgan Chase Bank account number 589336093 held in the name of Ninel Kononenko on or about April 20, 2021, and all proceeds traceable thereto.